



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

MAY 31 2017

Mr. Samuel Unger  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, California 90013

Mr. Mohsen Nazemi  
Deputy Director  
California Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630-4732

Subject: Transmittal of Anti Degradation Policy Analysis  
Dual Site Groundwater Operable Unit, Montrose Chemical and Del Amo  
Superfund Sites, Los Angeles California

Dear Mr. Unger and Mr. Nazemi:

Consistent with State Resolution 68-16, also known as the "Anti-Degradation Policy," EPA has completed its draft Anti-Degradation Policy analysis (enclosed) for the Dual Site Operable Unit, Montrose and Del Amo Superfund Sites located in Los Angeles, California. The analysis is intended to evaluate the application of the Anti-Degradation Policy to the reinjection of treated groundwater and includes the following elements: (1) a description of how the reinjection (or discharge) of treated water from the groundwater remediation system might impact existing water quality in the underlying aquifers; and (2) a discussion of the benefits of operating the system in light of any potential reduction in water quality. This analysis focuses on the planned operation of the groundwater treatment system and considers whether the system incorporates the best practicable treatment technologies. EPA has worked closely with the Los Angeles Regional Water Quality Control Board (LA Regional Water Board) and the Department of Toxic Substances Control (DTSC) in completing this analysis.

EPA has concluded that operation of the groundwater remediation system and the reinjection of treated water in the western wellfield where it will be recaptured is consistent with the State's Anti-Degradation Policy. Once operational, the groundwater system is expected to meet the following objectives: treat over 67 hazardous groundwater contaminants, either completely removing them or treating them to concentrations close to zero; remove up to 22,000 pounds of hazardous groundwater contaminants and up to 43,000 pounds of parachlorobenzene sulfonic acid (pCBSA) annually; restore groundwater beneath the residential neighborhood and protect a potential drinking water supply for the communities of Torrance, Gardena, West Carson, Dominguez, and unincorporated Los Angeles County; prevent the spread of hazardous substances in the groundwater; and begin reducing the concentrations of pCBSA.

In conducting the Anti-Degradation Policy analysis, EPA determined that the groundwater treatment system will use the best available treatment technologies to address the multitude of chemicals currently in the groundwater. To recapture the injected treated groundwater, EPA intends to begin operation of the treatment system by reinjecting only into the western wellfield, as opposed to equally into both the eastern and western well fields. To verify whether reliance on the western injection wellfield alone can meet the remedial action objectives of the Dual Site Groundwater Operable Unit Record of Decision (ROD), EPA will oversee implementation of a robust monitoring and data collection program during the initial period of system operations. The monitoring program will include collection of data, evaluation of treatment system performance, and installation of new monitoring wells to track and evaluate pCBSA in all aquifers within the injection area. The acquired information will be used to update the site conceptual model and recalibrate the numeric groundwater model.

As you are aware, EPA committed in its Record of Decision to “re-evaluate whether additional toxicological studies have been performed for pCBSA, assess the extent of pCBSA plume and make determinations as to whether the remedy remains protective with respect to pCBSA.” [ROD, page 11-27]. The statutorily-mandated Five-Year Review process includes an evaluation of all operation and monitoring data to ensure that the remedy is and will remain protective of human health and the environment. EPA will begin the next such review of the groundwater remedy in 2019. As part of that review, EPA will evaluate whether recent reassessments of pCBSA toxicity impact the protectiveness of the remedy and will take any recommended actions to ensure remedy protectiveness.

Finally, EPA will continue to consult with the LA Regional Water Board and DTSC during this evaluation period. If EPA ultimately determines, after consultation with DTSC, that reinjection outside the western wellfield is necessary, EPA will consult and closely coordinate with the LA Regional Water Board regarding the impact of any such change on compliance with the Anti-Degradation Policy.

Sincerely,

A handwritten signature in black ink, appearing to read "Dana Barton", with a stylized flourish at the end.

Dana Barton  
Acting Assistant Director  
Superfund Division

Attachments

Draft Anti-Degradation Policy Analysis

cc: Gina Solomon, Cal EPA